

### **REMARKS/ARGUMENTS**

Claims 1, 5-11, 19, 23-29, 35 and 36 were rejected under 35 U.S.C. 103(a) over Lorie (U.S. Patent 5,933,531) in view of Jansen et al. (U.S. Patent 6,243,450). Applicant respectfully traverses this rejection.

Claim 1 recites a method for document processing, in which images of document fields are received over a network from a client and are processed to code information contained in the fields. Directory look-up is used to check whether the information is coded correctly. The checked, coded information is returned to the client over the network. Payment is received from the client according to the number of fields that were processed, based upon a price per field processed.

In rejecting claim 1, the Examiner asserted that Lorie discloses the steps of receiving images of fields from a client via a computer network and returning the checked coded information over the network to the client. In response to the previous Official Action in this case, Applicant pointed out that Lorie makes no mention of any sort of client, nor does he mention or even suggest that images might be sent over a computer network and coded information returned over the network. In the Response to Arguments in the present Official Action, the Examiner attempted to refute this explanation, on the following grounds:

- (1) "Lorie discloses the method of receiving images of fields and returning checked coded information," citing col. 1, line 16 – col. 2, line 9, and Fig. 1.
- (2) "Lorie further discloses one embodiment of this method being use of any transmitting/receiving medium such as the Internet or other communications network or link," citing col. 8, lines 50-67.

With regard to point (1), Applicant acknowledges that receiving field images and returning coded information is a function of conventional OCR systems, and OCR results are commonly checked for accuracy, as described in the cited passage. But Lorie says nothing whatsoever about receiving field images from a client or transmission of the results to the client, nor

does it even hint that the images and results might be transmitted over a network, as required by claim 1.

As for point (2), the cited passage is no more than a boilerplate recitation of how computer software programs implementing Lorie's invention may be provided to a computer, including transmission of a program over the Internet (line 61). This passage has nothing to do with transmission of images or "checked, coded information" resulting from image processing. It is all but inconceivable that the passing mention of the Internet in this generic context might have suggested to a person of ordinary skill in the art the specific steps of receiving images of fields from a client via a computer network and returning checked coded information over the network to the client, as recited in claim 1.

In the rejection of claim 1, the Examiner went on to state:

"Lorie fails to specifically disclose receiving payment for a service based upon a price per unit of service. However, Jansen discloses receiving payment for a service based upon a price per unit of service."

As Applicant has pointed out previously, however, Jansen charges for service using a conventional model of price per unit time, rather than charging for processing fields containing information on the basis of a price per field, as required by claim 1. The Examiner did not respond to this point at all in the present Official Action. In other words, the Examiner has failed to show that the idea of "receiving payment... according to the number of the fields processed, based upon a price per field processed" is disclosed or suggested anywhere in the prior art.

In the Response to Arguments in the present Official Action, the Examiner stated that "the applicant argues that the combination of Lorie and Jensen is impermissible hindsight (page 3)." The Examiner has misrepresented Applicant's statement, which was that "the only teaching of record that might point in the direction of charging for processing based on a price per field processed is impermissible hindsight from the present patent application." Jansen is directed to

vending public multimedia services, not processing of form documents, and so could not possibly have suggested using the number of fields processed as a basis for payment. The Examiner himself acknowledged that Lorie does not disclose "receiving payment for a service based upon a price per unit of service." Neither of these references even hints at charging for processing based on a price per field processed.

Thus, regardless of how the references cited by the Examiner might be combined, they fail to teach or suggest not just one, but several distinguishing elements of claim 1. The Examiner has fallen far short of the requirement stated in MPEP 2143.03 that "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art."

Therefore, Applicant respectfully reiterates that claim 1 is patentable over the cited art, as are dependent claims 5-11. Apparatus and software claims 19, 23-29, 35 and 36 are also believed to be patentable for the reasons explained above.

Claims 4 and 22 were rejected under 35 U.S.C. 103(a) over Lorie in view of Jansen and further in view of DiPiazza et al. (U.S. Patent 6,028,970). Applicant respectfully traverses this rejection on the basis of the patentability of amended claims 1 and 19. Furthermore, claims 4 and 22 recite subject matter that is independently patentable over the cited references, as explained below with regard to claim 12.

Claims 12-16, 18, 30-34 and 37 were rejected under 35 U.S.C. 103(a) over Lorie in view of DiPiazza, while claim 17 was rejected over Lorie in view of DiPiazza and further in view of Jansen. Applicant respectfully traverses these rejections.

Independent claim 12 recites a method for processing forms including data in a predefined domain. The method uses a directory that is defined for the domain by selecting data specific to the domain from one or more general databases in advance of reading out contents of the

forms for processing. Information filled into a field on the forms is received from a client via a computer network, and is checked for correctness by looking up the information in the directory.

In rejecting this claim, the Examiner again maintained that Lorie discloses receiving information from a client via a computer network. As pointed out above in reference to claim 1, however, Lorie neither teaches nor suggests communication with a client over a network. Lorie also fails to disclose or suggest defining a directory for a domain by selecting data specific to the domain from one or more general databases.

DiPiazza describes a method for enhancing OCR using a rule base determined by recognition of a particular context type of an electronic bit-map portion (abstract). The rule base is selected from a plurality of rule bases for the determined context type (col. 3, lines 40-41). Examples of context types mentioned by DiPiazza include a business order form, pages of a magazine, and a facsimile cover sheet (col. 5, lines 12-17). Separate and apart from these context types, DiPiazza describes a database enhancement module, which stores data values such as area codes, credit card and bank account information, and customer names, for use in data verification (col. 8, line 51 – col. 9, line 15).

DiPiazza, in other words, uses database information in verifying OCR results in exactly the same manner as does Lorie (and other sources in the prior art): information lookup in general databases. Contrary to the Examiner's assertion, DiPiazza neither teaches nor suggests defining a directory by selecting data specific to the domain from one or more of these general databases, as recited in claim 12. The Examiner appears instead to have taken the position that DiPiazza's "rule bases" are somehow "a directory" containing domain-specific data selected from general databases. This interpretation, however, is contrary to the clear, literal sense of DiPiazza himself, since DiPiazza presents his information-lookup database and his rule bases as separate and distinct entities (as shown, for example, in col. 9, lines 16-28).

Furthermore, even if the Examiner's contrary interpretation of DiPiazza were to be adopted, there is still no suggestion in DiPiazza of defining a rule base relating to a predefined

domain by selecting rules specific to the domain from one or more general rule bases, as would be required for parallelism with claim 12. The fact that DiPiazza may have rule bases specific to certain context types does not mean that they are selected from a general rule base, nor does DiPiazza teach or suggest that there might be a general rule base of this sort.

Thus, Lorie and DiPiazza fail to disclose, or even to suggest, a number of elements of claim 12. Therefore, claim 12 is patentable over the cited art, as are dependent claims 13-18. Apparatus and software claims 30-34 and 37 are also believed to be patentable for the reasons explained above.

Notwithstanding the patentability of the independent claims in this application, the dependent claims are also believed to recite independently-patentable subject matter. In the interest of brevity, however, Applicant will refrain from arguing the independent patentability of the dependent claims at present.

Applicant has studied the additional reference made of record by the Examiner (Murez, U.S. Patent 5,579,407) and believes all of the claims in the present patent application to be patentable over this reference, as well, whether the reference is taken alone or in combination with the other references cited above.

Applicant believes the remarks presented hereinabove to be fully responsive to all of the grounds of rejection raised by the Examiner. In view of these remarks, Applicant respectfully submits that all of the claims in the present application are in order for allowance. Notice to this effect is hereby requested.

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Respectfully submitted,

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